



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

JUL 24 2013

Kate Huckelbridge  
Energy, Ocean Resources and Federal Consistency  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105-2219

Re: **CD-001-13**, Consistency Determination, EPA NPDES General Permit for  
Offshore Oil and Gas Facilities

Dear Ms. Huckelbridge:

This letter is in follow-up to the telephone discussion on July 23, 2013 between yourself and Eugene Bromley of Region 9's NPDES Permits Office concerning certain changes we are considering for our final general NPDES permit for offshore oil and gas facilities in Federal waters off Southern California (NPDES permit No. CAG280000). As you know, the California Coastal Commission concurred with Region 9's consistency determination for the draft general permit at the Commission's meeting on June 12, 2013. We wanted to be sure the changes we are considering for the final permit would be considered minor and that no further action from the Commission itself would be required. The following changes were discussed during the call:

- For platforms with low volume discharges of produced water (to be defined as less than 100,000 gal/day), revise the requirements for on-line oil and grease monitors to require tests at least once/4 hours rather than once/hour. This would be in response to industry concerns about available staffing on certain platforms. We estimate that the platforms in the low volume category discharge about 1.5% of the total produced water discharged from all platforms.
- Add a requirement that permittees maintain an inventory of chemicals used for well treatment fluids. This information would be reported with the quarterly discharge monitoring reports. This change would be in response to recent concerns about chemicals used for hydraulic fracturing (which would be classified as well treatment fluids).
- Revise the annual discharge limits for drilling muds and cuttings for PXP's platforms (Harvest, Hidalgo and Hermosa) in accordance with PXP's request in its letter of February 5, 2013. Even with the revisions, the limits for PXP's platforms would still be smaller than the limits for the majority of the other platforms.

During the call, you indicated that the above changes would be considered minor and that the revised permit would not have to be brought before the Commission again. For the record, however, you recommended that Region 9 send this letter noting the above changes and that you would respond confirming that no further Commission action would be necessary.

Thank you for your cooperation in this matter. Should you have any questions, please contact me at (415) 972-3464 or Eugene Bromley of the NPDES Permits Office at (415) 972-3510.

Sincerely,

A handwritten signature in dark ink, appearing to read "David Smith", written in a cursive style.

David Smith, Manager  
NPDES Permits Office (WTR-5)